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Attorney for Defendant  
**BASSAM SALMAN**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) Case No.: CR 11-0625 EMC  
Plaintiff, )  
vs. )  
BASSAM SALMAN, )  
Defendant. )  
\_\_\_\_\_  
) **STIPULATION AND [PROPOSED]**  
) **ORDER CONTINUING STATUS**  
) **HEARING**  
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Plaintiff, by and through its attorney of record, Adam Reeves, and defendant, by and through his attorney of record, Gail Shifman, hereby stipulate and ask the Court to find as follows:

1. That the parties are currently scheduled for a status hearing date of April 25, 2012 at 2:30 p.m. This date was set by Clerk's Notice continuing the originally scheduled status hearing date of April 18, 2012. Defense Counsel has a scheduling conflict on the continued date of April 25, 2012, appearing before the Honorable Phyllis Hamilton, in United States vs. Asim Waqar,

**STIPULATION & [PROPOSED] ORDER  
CONTINUING STATUS HEARING**

CR 11-0464 PJH.

2. That counsel for the defendant requests that the Court vacate the April 25, 2012 status hearing date and continue it until May 9, 2012 at 2:30 p.m. and counsel for the United States does not object to this request.

3. That the parties agree that the failure to grant such a continuance would unreasonably deny counsel the reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence and that April 18, 2012 through May 9, 2012 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), on the basis that the ends of justice are served by taking such action which outweigh the best interest of the public and the defendant in a speedy trial and also under subsection (B)(iv) for effective preparation of counsel, taking into account the exercise of due diligence.

Dated: March 20, 2012

## /S/

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**Adam Reeves**  
**Assistant United States Attorney**

Dated: March 20, 2012

/s/  
Gail Shifman  
Attorney for Defendant Bassam Salman

## [PROPOSED] ORDER

This matter having come before the Court upon the Stipulation of the parties and GOOD  
CAUSE APPEARING

IT IS ORDERED That the April 25, 2012 status hearing date shall be vacated and continued until May 9, 2012 at 2:30 p.m.;

**STIPULATION & [PROPOSED] ORDER  
CONTINUING STATUS HEARING**

1 IT IS FURTHER ORDERED that the time from April 18, 2012 through May 9, 2012  
2 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§  
3 3161(h)(7)(A) and (B)(iv), to provide the defense time to review discovery and for effective  
4 preparation and for continuity of counsel. The Court finds that (A) failure to grant the  
5 continuance would unreasonably deny defendants the reasonable time necessary for effective  
6 preparation, taking into account the exercise of due diligence; and (B) the ends of justice served  
7 by the continuance outweigh the best interests of the public and the defendants in a speedy trial.  
8

9 See 18 U.S.C. § 3161(h)(1)(7)(A) & (B)(iv).

10 Dated: March 23, 2012

